

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Matthew McDermott,

Plaintiff,

v.

K-Radio LLC,

Defendant.

Docket No: 1:22-cv-02105-ARR-SJB

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT**

PLEASE TAKE NOTICE that, upon this Notice of Motion; the declaration of Craig B. Sanders and exhibits attached thereto, the declaration of Matthew McDermott and exhibits attached thereto, the Memorandum of Law, and the pleadings and prior proceedings herein; Plaintiff Matthew McDermott will move the Court, before the Honorable Allyne R. Ross (U.S.D.J.) at the United States District Court, Eastern District of New York, 225 Cadman Plaza E., Brooklyn, NY 11201, at a time and place determined by the Court for an Order GRANTING Plaintiff's application for default judgment under Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2 in the amount of \$11,500.00 in statutory damages under 17 U.S.C. § 504(c); \$5,000.00 in statutory damages under 17 U.S.C. § 1202(c)(3)(B); \$4,050.00 in attorneys' fees and \$457.00 costs under 17 U.S.C. § 505; and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant's opposition papers, if any, must be served within 14 days after service of these motion papers upon Defendant in accordance with L.R. 55.2.

Dated: August 22, 2022

SANDERS LAW GROUP

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